



THE LAW OFFICE OF  
AVRAM E. FRISCH LLC

New Jersey Office  
1 University Plaza  
Suite 119  
Hackensack, NJ 07601

New York Office  
150 Broadway  
Suite 900  
New York, NY 10038

Avram E. Frisch Esq. – Admitted in NY and NJ. Mail to NJ address.

April 16, 2025

Hon. Claire C. Cecchi, U.S.D.J.  
United States District Court  
District of New Jersey  
Martin Luther King, Jr. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Via Electronic Filing**

Re: METROPOLITAN WOODWORKING, INC. v. LATOURETTE (2:24-cv-07483)

Dear Judge Cecchi:

This firm represents Plaintiffs in the above referenced matter. This letter is to request an extension of the time to file Plaintiff's amended complaint, as set forth in your order of March 18, 2025. In your order, you permitted 30 days to file a proposed amended complaint. Unfortunately, last Monday my mother underwent emergency brain surgery and had been hospitalized for most of the week prior to the Passover holiday. Family obligations related to this emergency have limited my time in the office since that time, and I have not been able to complete work on the amended complaint. Due to my upcoming trial schedule, I am requesting a 21 day extension to file the amended complaint.

I have attempted to reach Defendants' counsel several times, but have not received a response as to this request.

Very truly yours,

Avram E. Frisch

Cc: Defendants' Counsel (NJ OAG)

SO ORDERED

s/Claire C. Cecchi  
CLAIRE C. CECCHI, U.S.D.J.

Date: 4/17/2025